Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Application by	)	
Qwest Communications International, Inc.	)	WC Docket No. 02-189
for Authorization To Provide	)	
In-Region, InterLATA Services	)	
in the States of Montana, Utah,	)	
Washington, and Wyoming	)	

COMMENTS OF INTEGRA TELECOM OF UTAH, INC. AND INTEGRA TELECOM OF WASHINGTON, INC.

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SUMMARY

The Commission cannot approve Qwest's Application for Section 271 authority for Utah or Washington based upon the UNE loop rates allowed to go into effect on July 10, 2002 by the Public Service Commission of Utah and the Washington Utilities and Transportation Commission for their respective states. First, the state commissions have not approved these rates. Second, the new rates purport to be based upon the "benchmarking" test adopted by the Commission, but Qwest completely misapplies that test. Third, the "benchmarking" test as applied by Qwest does not produce cost-based rates. Finally, use of the "benchmarking" test is not appropriate because Qwest has not shown that Colorado is an appropriate benchmark state. The UNE loop rates in Washington are excessively high in comparison to other states, and have not been calculated correctly. Finally, the Qwest Applications for Utah and Washington should be denied because there is insufficient competition in Utah and Washington to justify granting Qwest long-distance authority.

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Integra Telecom of Utah, Inc. and Integra Telecom of Washington, Inc. (collectively, "Integra") submit these comments concerning the above-captioned Consolidated Application of Qwest Communications International, Inc. ("Qwest") for authority to provide In-Region, InterLATA Services in Montana, Utah, Washington, and Wyoming filed July 12, 2002 ("Application").[1] Integra Telecom of Utah, Inc. and Integra Telecom of Washington, Inc., provide competitive local exchange and long distance services in Utah and Washington, respectively.

Qwest has made substantial progress in Utah and Washington toward meeting the competitive checklist requirements of Section 271 of the Telecommunications Act of 1996 ("Telecom Act"). However, the unbundled network element ("UNE") pricing for loops that

[1] *Comments Requested on the Application By Qwest Communications International, Inc. for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the States of Montana, Utah, Washington, and Wyoming*, Public Notice, WC Docket No. 02-189, DA 02-1666, released July 12, 2002.

Qwest charges its competitors is too high and must be significantly reduced in both Utah and Washington before Qwest may be granted Section 271 authority in those states.

I. THE COMMISSION SHOULD REJECT THE UNE LOOP RATES PROPOSED FOR UTAH

On July 2, 2002, Qwest filed a revision to its Utah SGAT whereby, *inter alia*, it lowered its UNE loop rates. The Public Service Commission of Utah ("PSCU") allowed the new rates to become effective July 10, 2002.[2] Prior to the July 2, 2002 Qwest filing, the UNE loop rates in effect in Utah were those set by the PSCU on June 2, 1999.[3]

The Federal Communications Commission ("Commission") cannot approve Qwest's application for Section 271 authority in Utah based upon the UNE loop rates submitted to the PSCU on July 2, 2002. First, the PSCU has not reviewed these rates. Second, the rates purport to be based upon the "benchmarking" test adopted by the Commission,[4] but Qwest completely misapplies that test. Third, the "benchmarking" test as applied by Qwest does not produce cost-based rates. Fourth, use of the "benchmarking" test is not appropriate because Qwest has not shown that Colorado is comparable to Utah.

A. The PSCU Has Not Evaluated the Loop Prices

Under the Telecom Act, state commissions set the rates for unbundled network elements.[5] The new UNE loop rates just submitted to the PSCU have not been reviewed by the PSCU, nor have they been tested in an appropriate proceeding, including by hearings. The PSCU has

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2 *Application of Qwest Corporation for Approval of Compliance with 47 U.S.C. § 271(d)(2)(B), Final Order Regarding Qwest § 271 Compliance*, Docket No. 00-049-08 (PSCU Jul. 8, 2002).

3 *Investigation into Collocation and Expanded Interconnection*, Docket No. 94-999-01, Phase III Part C Report and Order, Table A at 10 (PSCU Jun. 2, 1999) (*"Utah Phase III-C Order"*).

4 Qwest Application at 159-160.

5 *See* 47 U.S.C. §§ 252(c)(2), 252(d).

allowed the proposed rates to go into effect, but has not yet evaluated the rates.[6] Because there has been no reasonable evaluation of Qwest's rates and costs, the Commission should deny Qwest long-distance authority in Utah.

B. Qwest Misapplies "Benchmarking"

The UNE loop rates that Qwest has unilaterally set in Utah are allegedly justified by the "benchmarking" test adopted by the Commission[7] in the *Pennsylvania 271 Order.* There, the Commission used a "benchmarking" test to confirm whether specific UNE rates already set by the Pennsylvania Public Utility Commission were within "the range that a reasonable TELRIC-based ratemaking would produce" by comparing them to rates of other states.[8] The benchmarking test was one tool developed by the Commission to determine whether a Bell Operating Company's ("BOC") UNE rates were in compliance with TELRIC. Qwest, though, in the instant Application, transforms that analytical tool into a rate-setting formula for generating new UNE rates. As Qwest states, "Qwest reduced the 2-wire loop rates in each zone in the state by a uniform percentage to bring the composite statewide average rate down to the level of the Colorado benchmarked composite rate."[9]

The Commission must reject this approach. First, by reducing existing UNE loop rates by "a uniform percentage," Qwest fails to establish rates based on a "bottom up" approach as

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6 Qwest Application at 165; Qwest Application App. A, Tab 29, Declaration of Jerrold L. Thompson (Cost-Based Rates for Unbundled Network Elements and Interconnection in Utah) at ¶ 37.
The PSCU issued a Procedural Order setting up a schedule for considering deaveraged recurring rates for basic 2- and 4-wire analog (voice grade) unbundled loops, subloop elements, tandem switching, local switching, and the analog port on June 11, 2002. Currently, it calls for hearings to be held November19-21, 2002. *In the Matter of the Determination of the Cost of the Unbundled Loop of Qwest Corporation, Inc.,* Docket No. 01-049-85, Procedural Order (Jun. 11, 2002).

7 Qwest Application at 159-160.

8 *Application of Verizon Pennsylvania Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc.,* and *Verizon Select Services Inc. for Authorization to Provide In-Region, InterLATA Services in Pennsylvania,* 16 FCC Rcd 17419 (2001) ("*Pennsylvania 271 Order*") at ¶ 62.

9 Qwest Application at 163.

required by the Commission.[10] Second, the Commission used the benchmarking test as a tool for comparing rates once they had been set in each state, not as a rate generating formula as Qwest has done here. Accordingly, Qwest's use of "benchmarking" to generate rates does not show that they conform to TELRIC in Utah.

C. Benchmarking As Applied by Qwest Does Not Produce Cost-Based Rates

Proper application of the "benchmarking" test demonstrates that the Qwest application must be denied. By reducing UNE loop rates in Utah, Qwest acknowledges that the UNE rates set three years ago by the PSCU are not TELRIC compliant. Those initial rates, however, are the only rates that have been considered by the PSCU, and the PSCU acknowledged when it set them that they were not TELRIC compliant. Rather, after a tremendous amount of work, the PSCU stated that it had no choice but to set "appropriate" prices for unbundled network elements based upon the record it had before it, which contained no basis upon which to estimate the relationship prices should bear to costs.[11] The PSCU described the reasons that the cost estimation models before it failed to meet the criteria for an acceptable cost estimation model,[12] and expressed its hope that "a future docket . . . may offer us an opportunity to choose a model that both designs a reliable forward-looking economically efficient network and provides

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[10] *Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc for Provision of In-Region, InterLATA Services in Georgia and Louisiana,* CC Dkt. No. 02-35, Memorandum Opinion and Order (rel. May 15, 2002) ("*Georgia/Louisiana 271 Order*") at ¶ 287 ("UNEs are priced from the 'bottom up,' that is beginning with a BOC's costs plus a reasonable profit[.]")

[11] *Utah Phase III-C Order* at 10.

[12] The PSCU had no adequate model before it that it could use to set TELRIC-compliant rates. The model used by Qwest and the PSCU's Division of Public Utilities, called the Integrated Cost Model, or ICM, failed "to produce a comprehensive, efficient, forward-looking result. Instead, the ICM prorates a sample of recent historical costs based on characteristics of various exchanges. It does not design a network, but mimics the embedded costs and practices of recent network experience." With regard to the HAI model, the PSCU said that "the record shows that the HAI model employs a forward-looking, economically efficient approach. Nevertheless, we find significant problems with the algorithms that locate and design distribution plant." *Utah Phase III-C Order* at 7-8.

plausible TELRIC costs."[13] Thus, for example, in order to set a rate for the two-wire loop, the PSCU split the difference between the two unacceptable statewide weighted average monthly cost estimates produced by the faulty cost estimation models, $11.40 per AT&T's HAI and $21.51 per Qwest's ICM (*i.e.*, the PSCU added them together and then divided by two to arrive at the weighted average monthly cost estimate for the two-wire loop that it accepted, $16.46).[14]

Accordingly, the PSCU has never set TELRIC-compliant UNE loop rates. While the new rates are lower than the old rates, there is no reason to believe that they are based on TELRIC since the old rates were not set based on Qwest's costs in accordance with TELRIC.

D. The "Benchmarking" Test is Not Appropriate

Moreover, application of the "benchmarking" test is inappropriate in these circumstances. The test to determine when benchmarking is appropriate was stated in the *Pennsylvania 271 Order.* The Commission has stated that:

> … a comparison is permitted when the two states have a common BOC; the two states have geographic similarities; the two states have similar, although not necessarily identical, rate structures for comparison purposes; and the Commission has already found the rates in the comparison state to be reasonable.[15]

However, Qwest has made no demonstration whatsoever that the criteria described above, other than a common BOC, have been satisfied in order to permit benchmarking of UNE rates in Colorado to UNE rates in Utah. Accordingly, there is no basis for the Commission to conclude on this record that using Colorado rates to generate Utah rates under a benchmarking approach is appropriate.

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13 *Utah Phase III-C Order* at 8.
14 *Utah Phase III-C Order* at 8.
15 *Pennsylvania 271 Order* at ¶ 63.

II. THE COMMISSION SHOULD REJECT THE UNE LOOP RATES PROPOSED FOR WASHINGTON

A. The Same Defects Applicable to Utah Rates Also Apply to Washington Rates

In addition to filing new rates in Utah, on June 10, 2002, Qwest filed new tariff pages with the Washington Utilities and Transportation Commission ("WUTC") in Docket No. UT-020724 that included a reduction in its rates for 2-wire deaveraged unbundled loops. Qwest filed the tariff pages with an effective date of July 10, 2002. The Commission took no action on Qwest's filing at its June 26, 2002, open public meeting, allowing the tariff pages to become effective on July 10, 2002.[16] (On June 11, 2002, Qwest also filed a corresponding revised Washington SGAT Exhibit A that included reductions to UNE loop rates, which the WUTC allowed the to go into effect July 10, 2002.) Prior to the June 10, 2002 Qwest filing, the most recent deaveraged UNE loop rates in effect in Washington were those set by the WUTC December 15, 2000.[17]

The Commission cannot approve Qwest's application for Section 271 authority in Washington based upon the UNE loop rates submitted to the WUTC on June 10, 2002 for all of the reasons previously set out with regard to Qwest's Utah Application: the WUTC has not

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16 *See Investigation Into U S West Communications, Inc.'s Compliance With Section 271 of the Telecommunications Act of 1996; In the Matter of U S West Communications, Inc.'s Statement of Generally Available Terms Pursuant to Section 252(f) of the Telecommunications Act of 1996*, Dockets No. UT-003022, UT-003040, 39th Supplemental Order; Commission Order Approving SGAT and QPAP, and Addressing Data Verification, Performance Data, OSS Testing, Change Management, and Public Interest at IV.D.4.9 (WUTC Jul. 1, 2002) ("*WUTC 39th Supplemental Order*"); *also see* Qwest Application App. A, Tab 30, Declaration of Jerrold L. Thompson (Cost-Based Rates for Unbundled Network Elements and Interconnection in Washington) at ¶ 36, 37 ("Thompson Washington Declaration").

17 *Pricing Proceeding for Interconnection, Unbundled Element, Transport and Termination, and Resale; Pricing Proceeding for Interconnection, Unbundled Elements, Transport and Termination, and Resale for U S West Communications, Inc.; Pricing Proceeding for Interconnection, Unbundled Elements, Transport and Termination, and Resale for GTE Northwest Incorporated*; Dockets No. UT-960369, UT-960370, UT-960371, Thirty-First Supplemental Order; Order on Reconsideration; Modifying Prior Order; Directing Refiling (WUTC Dec. 15, 2000).

evaluated these Washington rates;[18] the Washington UNE rates have not been established using a "bottom up" approach; Qwest's use of benchmarking as its own rate-making tool[19] does not show that the Washington rates conform to TELRIC; the benchmarking test as applied by Qwest does not produce cost-based rates; and use of the "benchmarking" test is not appropriate because Qwest has not shown that Colorado is an appropriate benchmark state.

B. Qwest Does Not Calculate the Washington "Benchmarked" Rates Correctly

Apart from the same defects that appear with respect to Utah, Qwest has not properly calculated the "benchmarked" rates for unbundled loops now in effect in Washington. Qwest claims that it "reduced the 2-wire loop rates in each zone in the state by a uniform percentage to bring the composite statewide average rate down to the level of the Colorado benchmarked composite rate."[20] However, it did not actually do so. The Washington 2-wire unbundled loop prices Qwest claims resulted from benchmarking are higher than they should be, had Qwest made straightforward benchmarking calculations.

Qwest skewed the rates by pretending, throughout the series of calculations used in its benchmarking approach, that the WUTC has set a separate grooming charge for unbundled loops, which it has not, and that the grooming charge did not have to be reduced in the process of benchmarking rates for Washington unbundled loops. Specifically, Qwest compared the cost-adjusted Colorado unbundled loop rate with the Washington UNE-P loop price instead of the Washington unbundled loop rate as it should have. Since the Washington UNE-P loop rate is lower than the Washington unbundled loop rate, the <u>difference</u> between the Washington rate and

18 Qwest Application at 165; Thompson Washington Declaration at ¶ 37.
19 Qwest Application at 159-160.
20 Qwest Application at 163.

the Colorado rate is made smaller, and so the Washington rates were reduced less, and ultimately the resulting "benchmarked" rates for Washington calculated by Qwest are inaccurately high.[21]

Qwest's Senior Director – Cost Advocacy, Jerrold L. Thompson, buried the rationale for Qwest's use of this methodology in footnote 70 of his Declaration:

> It should be noted that, for benchmarking purposes, Qwest compared the cost-adjusted Colorado rate to the Washington unbundled loop rate that applies in the context of UNE-P, $17.61, rather than the higher ($18.16) rate that applies when an unbundled loop is purchased separately from the analog port. This comparison is appropriate because (1) the SM is designed to examine the relative costs of retail services in which, like UNE-P, elements are combined;[22] and (2) the basic $15.85 Colorado loop rate, which serves as the starting point in the benchmark analysis, also excludes a separate additional charge ($2.06) that applies when IDLC carrier systems must be demultiplexed down to separate channels.[23] (Note that the Colorado "grooming" charge and the Washington "grooming" charge are not comparable on an "apples-to-apples" basis, since they apply under different conditions: the Washington charge applies to stand-alone loops that are not purchased with switch ports, while the Colorado charge applies only when IDLC carrier systems are used. (Footnotes added.)

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[21] Rather than reducing the deaveraged unbundled loop rates set by the WUTC by a percentage arrived at via benchmarking, Qwest carved out $0.55 from each un-benchmarked deaveraged unbundled loop rate, reduced the remaining amount (which equals the UNE-P loop cost), and then added back in the $0.55 in its entirety with no reduction to the $0.55 to come up with the "benchmarked" unbundled loop rates for Washington. If Washington had a separate stand-alone grooming charge of $0.55, not integral to the unbundled loop rate, that would be appropriate. However, it does not have a separate grooming charge.

By first parsing out one piece of the cost data used by the WUTC in setting the cost of a two-wire unbundled loop (the grooming piece) and not reducing it, Qwest's "benchmark" rates for two-wire unbundled loops are $0.09 - $0.11 higher (depending upon the zone) than they would be if Qwest had done a straightforward uniform percentage reduction of unbundled two-wire loop rates. For example, the WUTC rate for an unbundled two-wire loop in Zone 1 is $7.91 (Thompson Washington Declaration at ¶ 19). Reducing the unbundled loop rate of $7.91 by 20.4% equals $6.30. However, if one instead reduces only the WUTC UNE-P (bundled) two-wire loop rate for Zone 1, which is $7.36 (Thompson Washington Declaration at ¶ 39) by 20.4%, getting $5.86, and then adds back in the full $0.55 cost element originally used by the WUTC in setting unbundled loop rates, you wind up with Qwest's Zone 1 "benchmarked" rate of $6.41. The use of this methodology alone increases the Washington benchmarked rate for Zone 1 by $0.11 (the difference between $6.30 and $6.41), and does not even take into account the effect of Qwest's miscalculation of the reduction percentage itself.

With regard to the "reduction percentage" - Qwest uses the lower Washington average <u>bundled/UNE-P</u> loop rate of $17.61 instead of the higher average <u>unbundled</u> loop rate of $18.16 in calculating the percentage by which Washington unbundled loop rates are reduced via benchmarking (Thompson Washington Declaration at ¶¶ 17, 39); as a result, the percentage by which Washington rates must be reduced pursuant to benchmarking is inaccurately low (to Qwest's benefit).

[22] Carrying Mr. Thompson's reasoning here out to its logical end would suggest that the use of SM (the FCC's universal service synthesis model) is not appropriate for comparing unbundled network element pricing because unbundled network elements are not combined liked retail offerings.

[23] The Colorado rate for an unbundled loop also excludes other irrelevant costs, which does nothing to change the fact that when applying benchmarking, one must compare the cost of an unbundled loop in one state to the cost of an unbundled, not bundled (UNE-P), loop in another state.

It is true that there was a difference of $0.55 between the deaveraged Washington unbundled loop rates and the Washington UNE-P loop rates that were set by the WUTC, and that the reason for the difference had to do with grooming.[24] However, there is no separate grooming charge in Qwest's Washington SGAT or tariff (although Mr. Thompson shows it as a separate item in Exhibit JLT-WA-2 of his Washington Pricing Declaration). To perform a benchmarking analysis, one must compare "apples to apples" and unbundled loops to unbundled loops, which Qwest has not done.

C. Washington UNE Loop Prices are High in Comparison to Other States

According to the July 1, 2002 update of the Survey of Unbundled Network Element Prices in the United States,[25] as of July 1, 2002, the National UNE Weighted Average Loop Rate was $13.43, and the Washington UNE weighted average monthly loop rate was $14.56 (the weighted average monthly loop rate per Qwest's new "benchmarked" rates filed June 10, 2002), above the national average. Qwest's new loop rates that bring the average rate to $14.56 are still

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[24] The WUTC has stated that:

> U S West and GTE shall charge statewide average unbundled loop prices of $18.16 and $23.94, respectively, pending a Commission decision on geographically deaveraged prices in Phase III of this proceeding. When an interconnecting local exchange company orders a bundled loop and port from U S West, the statewide average price of the loop shall be $17.59.

and

> The price of a bundled loop for U S West should be $17.59 when a CLEC orders a bundled loop and port because grooming is not needed in that situation.

Pricing Proceeding for Interconnection, Unbundled Element, Transport and Termination, and Resale; Pricing Proceeding for Interconnection, Unbundled Elements, Transport and Termination, and Resale for U S West Communications, Inc.; Pricing Proceeding for Interconnection, Unbundled Elements, Transport and Termination, and Resale for GTE Northwest Incorporated; Dockets No. UT-960369, UT-960370, UT-960371, 17th Supplemental Order: Interim Order Determining Prices; Notice of Prehearing Conference, at ¶ 510 (WUTC Sep. 23, 1999).

[25] *See* Attachment 1. The report is available on the website of the National Regulatory Research Institute at http://www.nrri.ohio-state.edu/programs/telecommunications.html, and is also available on the website of the West Virginia Public Service Commission at the following address: http://www.cad.state.wv.us/Intro%20to%20Matrix.htm#N_1_.

too high to permit effective competition.[26] The Washington UNE loop rate must be reduced before effective competition can take place in Washington.

III. CONCLUSION

For the foregoing reasons, the Qwest 271 Applications for Utah and Washington should be denied.

Respectfully submitted,

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[26] Qwest's proposed new Washington rates for unbundled loops are $6.41, $11.35, $12.76, and $19.06 for Zones 1, 2, 3, 4, and 5, respectively. The port rate is $1.34 per month, and switching is rated at $0.00120 per minute of use. Qwest Washington SGAT at Sections 9.2.1, 9.11.1, and 9.11.7. *Also see* Thompson Washington Declaration at ¶ 20, 39.

ATTACHMENT 1

STATE LOOP AND UNE-P RATES SORTED BY WEIGHTED AVERAGE RATES

State	Average Monthly Loop Rates	State	Average Monthly UNE-P Rates
West Virginia	$24.58	West Virginia	$33.42
Montana	$23.72	Wyoming	$29.72
Wyoming	$23.39	New Hampshire	$28.13
Arizona	$21.98	South Dakota	$26.40
Mississippi	$21.26	Arizona	$26.39
South Dakota	$21.09	Montana	$25.99
New Mexico	$20.50	Mississippi	$25.75
Idaho	$20.42	Idaho	$23.49
Nevada	$19.83	Nevada	$23.07
Alabama	$19.04	New Mexico	$22.99
Kentucky	$18.41	Connecticut	$22.95
New Hampshire	$17.99	Alabama	$22.81
Minnesota	$17.87	Louisiana	$21.96
North Dakota	$17.79	Kentucky	$21.10
South Carolina	$17.60	Minnesota	$20.76
Nebraska	$17.51	Nebraska	$20.67
Louisiana	$17.31	South Carolina	$20.30
Georgia	$16.51	Massachusetts	$20.28
Iowa	$16.47	Maryland	$20.20
Maine	$16.19	Georgia	$19.99
Utah	$16.13	Oklahoma	$19.95
North Carolina	$15.88	North Carolina	$19.77
Colorado	$15.85	North Dakota	$19.75
Florida	$15.81	Colorado	$19.71
Missouri	$15.19	Utah	$19.69
Oregon	$15.00	Missouri	$19.49
Massachusetts	$14.98	Vermont	$19.44
Tennessee	$14.92	Texas	$19.17
Oklahoma	$14.84	Maine	$18.81
Washington	$14.62	Iowa	$18.31
Maryland	$14.50	Pennsylvania	$18.19
Vermont	$14.41	Wisconsin	$18.06
Texas	$14.15	Virginia	$18.00
Kansas	$14.04	Florida	$17.98
Rhode Island	$13.93	Tennessee	$17.61
Pennsylvania	$13.81	Oregon	$17.59
Virginia	$13.60	Kansas	$17.49
US Average	**$13.43**	**US Average**	**$17.48**
Arkansas	$13.09	Washington	$17.16
Connecticut	$12.49	Rhode Island	$17.07
Delaware	$12.05	Delaware	$17.06
New York	$11.49	Indiana	$16.98
Wisconsin	$10.90	Arkansas	$16.54
D.C.	$10.81	D.C.	$15.36
Michigan	$10.15	New York	$15.19
California	$9.93	Ohio	$14.87
Illinois	$9.81	Illinois	$14.82
New Jersey	$9.52	Michigan	$13.87
Indiana	$8.20	New Jersey	$12.89
Ohio	$7.01	California	$11.58